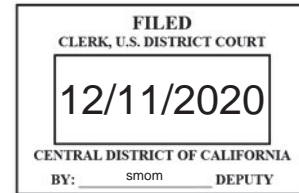


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Attorneys for Relator
Arash Alborzi, M.D.

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

UNITED STATES OF AMERICA *ex*
rel. [UNDER SEAL],

Plaintiff[s],

v.

[UNDER SEAL],

Defendant[s].

No. CV 18-10632 MWF (RAOx)

**RELATOR'S REQUEST FOR
DISMISSAL OF ACTION; CONSENT
OF THE UNITED STATES AND THE
STATE OF CALIFORNIA;
STIPULATION RE UNSEALING OF
CASE**

[FILED UNDER SEAL PURSUANT TO
THE FEDERAL FALSE CLAIMS ACT
(31 U.S.C. §§ 3730(b)(2) AND (3) AND
THE CALIFORNIA FALSE CLAIMS
ACT (CA GOVT. CODE § 12650 ET
SEQ.)

[LODGED CONCURRENTLY UNDER
SEAL: [PROPOSED] ORDER]

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UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

UNITED STATES OF AMERICA and
the STATE OF CALIFORNIA *ex rel.*
ARASH ALBORZI, M.D.,

Plaintiffs,

v.

UNIVERSITY OF SOUTHERN
CALIFORNIA; KECK SCHOOL OF
MEDICINE OF USC; USC VERDUGO
HILLS HOSPITAL; CONCORD
HOSPITALIST GROUP; ELEVATE
HEALTH GROUP; and DOES 1 through
10, inclusive,

Defendants.

No. CV 18-10632 MWF (RAOx)

**RELATOR'S REQUEST FOR
DISMISSAL OF ACTION; CONSENT
OF THE UNITED STATES AND THE
STATE OF CALIFORNIA;
STIPULATION RE UNSEALING OF
CASE**

[FILED UNDER SEAL PURSUANT TO
THE FEDERAL FALSE CLAIMS ACT
(31 U.S.C. §§ 3730(b)(2) AND (3) AND
THE CALIFORNIA FALSE CLAIMS
ACT (CA GOVT. CODE § 12650, ET
SEQ.)]

[LODGED CONCURRENTLY UNDER
SEAL: [PROPOSED] ORDER]

REQUEST FOR DISMISSAL BY RELATOR

Pursuant to Fed. R. Civ. P. 41(a)(2), *qui t im* plaintiff Arash Alborzi (the “Relator”), hereby requests that the Court dismiss, without prejudice, the above-captioned action (“this action”), and all of his claims against the defendants in this action, including but not limited to, his claims for reasonable attorney’s fees, expenses and costs pursuant to the Federal False Claims Act (31 U.S.C. § 3730(d) and the California False Claims Act (CA Gov’t Code § 12652(c)()).

Dated: December 9, 2020

FENTON LAW GROUP, LLP

/s/ Dennis E. Lee
DENNIS E. LEE
Attorneys for Relator Arash Alborzi

CONSENT OF THE UNITED STATES OF AMERICA AND CALIFORNIA

In the interests of justice, the Attorney General of the United States of America (“United States”) and the State of California, through the undersigned attorneys, hereby consent to the dismissal of this action without prejudice as to the United States and California.

Dated: December 10, 2020

Respectfully submitted,

NICOLA T. ANNA
United States Attorney
DAVID K. BARRETT
Assistant United States Attorney
Chief, Civil Fraud Section



LISA A. PALOMBO
Assistant United States Attorney

Attorneys for the
United States of America

XAVIER BECERRA
Attorney General of California



ELIZABETH VOORHES
Deputy Attorney General
Attorneys for the People of the State of California

STIPULATION RE UNSEALING OF CASE

The United States, the State of California, and the Relator, through their respective attorneys of record and subject to the approval of the Court, stipulate that, of the papers filed or lodged to date with the Court in this action, the following documents should be unsealed:

1. The Relator's Complaint;
2. The Relator's Amended Complaint;
3. The Relator's Request for Dismissal of Action; United States' Consent; Stipulation re Unsealing of Case; and
4. The accompanying proposed Order.

The United States, the State of California, and the Relator further stipulate that all other papers filed or lodged to date in this action should remain permanently under seal because such papers were provided by law to the Court alone for the sole purpose of discussing the content and extent of the United States' and California's investigation, and thereby evaluating whether the seal and time for making an election to intervene should be extended.

A proposed order is lodged concurrently herewith.

1 Dated: December 10, 2020

Respectfully submitted,

2 NICOLA T. HANNA
United States Attorney
3 DAVID K. BARRETT
Assistant United States Attorney
4 Chief, Civil Fraud Section

5 

6 LISA A. PALOMBO
Assistant United States Attorney

7
8 Attorneys for the
United States of America

9
10 Dated: December 10, 2020

XAVIER BECERRA
Attorney General of California

11
12 

13 ELIZABETH VOORHIES
Deputy Attorney General
14 Attorneys for the People of the State of California

15 Dated: December 9, 2020

FENTON LAW GROUP, LLP

16
17 /s/ Dennis E. Lee
18 DENNIS E. LEE
Attorneys for Relator
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28

PROOF OF SERVICE BY E-MAIL

I am over the age of 18 and not a party to the above-captioned action. I am employed by Fenton Law Group, LLP. My business address is 1990 S. Bundy Drive # 777, Los Angeles, CA 90025.

On December 11, 2020, I served **RELATOR'S REQUEST FOR DISMISSAL OF ACTION; CONSENT OF THE UNITED STATES AND THE STATE OF CALIFORNIA; STIPULATION RE UNSEALING OF CASE** on each person or entity named below by e-mail.

Date of e-mailing: December 11, 2020. Place of e-mailing: Los Angeles, California.

Person(s) and/or Entity(s) to whom mailed:

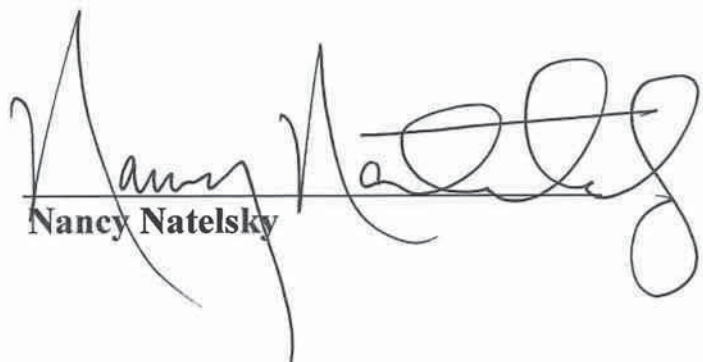
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Office of the Attorney General
1615 Murphy Canyon Road, Ste. 700
San Diego, CA 92108

I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 11, 2020, at Los Angeles, California.


Nancy Natelsky